

1
2
3
4
5
6
7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 NAV N GO KFT., a Hungarian limited
liability company,

11 Plaintiff,

12 vs.

13 MIO TECHNOLOGY USA LTD, a California
corporation,

14 Defendant.
15

Case No. 2:08-CV-1384-LRH-(LRL)

**STIPULATION AND
ORDER STAYING ACTION**

16 **STIPULATION**

17 WHEREAS, on July 14, 2009, the Court entered a preliminary injunction in favor of
18 Plaintiff Nav N Go Kft. ("Plaintiff" and/or "Nav N Go") and against Defendant Mio Technology
19 USA Limited ("Defendant" and/or "Mio USA"), effective upon Nav N Go's deposit of \$1,000
20 with the Clerk of the Court;

21 WHEREAS, on July 16, 2009, Nav N Go deposited \$1,000 with the Clerk of the Court;

22 WHEREAS the parties are presently engaged in good-faith settlement negotiations that
23 may resolve the action in its entirety;

24 WHEREAS, to facilitate settlement negotiations, the parties wish to stay this action for a
25 period of sixty (60) days from the date of entry of the Court's order approving this stipulation;

26 WHEREAS, the preliminary injunction shall not be affected by this stay of proceedings
27 and shall remain in full force and effect, subject to further order of the Court;

28 WHEREAS, this action shall only be stayed with respect to the time for Defendant to file

1 an answer or other responsive pleading, the time for the parties to meet pursuant to Rule 26(f) of
2 the Federal Rules of Civil Procedure, and with respect to the commencement of discovery; and

3 WHEREAS, by entering into the aforementioned stay, the parties wish to preserve all
4 rights, privileges, claims, and defenses that each may have against the other;

5 **NOW THEREFORE**, the foregoing is hereby agreed and stipulated by the parties through
6 their undersigned counsel of record:

7 By: /s/ Jonathan W. Fountain

By: /s/ Wayne O. Klomp

8 LEWIS AND ROCA LLP

JONES VARGAS

9 Michael J. McCue

John P. Desmond

Jonathan W. Fountain

Wayne O. Klomp

10 3993 Howard Hughes Pkwy., Suite 600

100 West Liberty St., 12th Floor

Las Vegas, Nevada 89169

Reno, Nevada 89504

11 (702) 949-8200 (tel.)

(775) 786-5000 (tel.)

12 (702) 949-8398 (fax)

(775) 786-1177 (fax)

13 Attorneys for Plaintiff
Nav N Go Kft.

-and-

14 BAKER & McKENZIE LLP

Colin H. Murray

Sanjay Bhandari

12544 High Bluff Drive, 3rd Floor

San Diego, California 92130

17 (858) 523-6200 (tel.)

(858) 259-8290 (fax)

18 Attorneys for Defendant

19 Mio Technology USA Ltd.

20 **ORDER**

21 This action is stayed for a period of sixty (60) days from the date this order is entered upon
22 the docket of this action. Upon expiration of this stay, the Defendant shall have ten (10) court
23 days to file and serve an answer or other responsive pleading. The preliminary injunction shall
24 remain in full force and effect throughout the duration of the stay and thereafter, subject to further
25 order of the Court.

IT IS SO ORDERED:

26 

27
28 UNITED STATES DISTRICT JUDGE

DATED: July 22, 2009